

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

JEFFERSON GRIFFIN,
Plaintiff,

v.

NORTH CAROLINA STATE
BOARD OF ELECTIONS,
Defendant,

and

ALLISON RIGGS, VOTEVETS AC-
TION FUND, NORTH CAROLINA
ALLIANCE FOR RETIRED AMER-
ICANS, SARAH SMITH, and
JUANITA ANDERSON,
Intervenor-Defendants.

NORTH CAROLINA DEMOCRATIC
PARTY,
Plaintiff,

v.

NORTH CAROLINA STATE BOARD
OF ELECTIONS et al.,
Defendants.

CARRIE CONLEY et al.,
Plaintiffs,

v.

ALAN HIRSCH et al.,
Defendants.

FILED

MAY 05 2025

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY *[Signature]* DEP CLK

Case No. 5:24-cv-00731-M

Case No. 5:24-cv-00699-M-KS

Case No. 5:25-cv-00193-M-RJ

MOTION FOR LEAVE TO FILE PRO SEAMICUS CURIAE BRIEF

BY JAY NORMAN DeLANCY, PRO SE

Pursuant to the inherent authority of this Court to permit the participation of *amicus curiae*, Jay Norman DeLancy respectfully moves this Court for leave to file the attached **amicus curiae brief** in support of the Plaintiffs and in furtherance of election law compliance and public integrity in the administration of federal elections.

Mr. DeLancy further asks the court to grant leeway on the deadline for this filing, on account of a gross misunderstanding of the limitations of Pacer and its restricted use only to attorneys. As the midnight deadline approached on Friday, Mr. DeLancy reached out to attorney, Adam Draper, who attempted to assist in the matter. While Mr. Draper was able to file the Notice of Appearance, he was unable to upload this petition and two other documents that were hand-delivered to the court on Monday, May 5, 2025. Proposed *amicus curiae* humbly apologizes for the inconvenience and begs the Court's pardon for this overdue filing.


Mr. DeLancy is the founder of the Voter Integrity Project – NC, a nonpartisan watchdog organization that investigates election practices, advises policymakers, and promotes adherence to federal and state election laws. He has a demonstrated interest in ensuring that voter registration processes comply with the Help America Vote Act (HAVA) and that election results reflect legally cast ballots.

The proposed amicus brief offers unique factual insights and legal arguments concerning the State Board of Elections' failure to conduct proper list maintenance or to correct known registration anomalies affecting thousands of 2024 general election ballots. It also proposes remedial actions for the Court to consider—actions that align with HAVA requirements and the public's right to transparent, lawful elections.

Granting this motion would assist the Court by providing context not otherwise supplied by the parties and by representing the interest of voters concerned about election integrity, particularly regarding records maintenance, ineligible registrations, and the proper tabulation of lawful votes.

For the foregoing reasons, Mr. DeLancy respectfully requests that this Court grant leave to file the attached *amicus curiae* brief.

Respectfully submitted,

/s/ Jay N. DeLancy 

Jay Norman DeLancy

Pro Se Amicus Curiae

296 Fairway Lane

Sanford, NC 27332

jay.delancy@gmail.com

919.429.9039 / 919.332.4129

Date: May 5, 2025